

EXHIBIT H

From: Mainland, Grant <GMainland@milbank.com>
Sent: Monday, February 10, 2020 5:02 PM
To: McKeen, Elizabeth L. <emckeен@omm.com>; Rappoport, Gaspard <Gaspard.Rappoport@weil.com>; Friedman, Peter <pfriedman@omm.com>; Uhland, Suzanne <suuhland@omm.com>; Hammack, Scott <shammack@omm.com>; Firestein, Michael A. <MFirestein@proskauer.com>; Rappaport, Lary Alan <LRappaport@proskauer.com>; tmungovan@proskauer.com; Mervis, Michael T. <MMervis@proskauer.com>; Dale, Margaret A. (mdale@proskauer.com) <mdale@proskauer.com>; Pavel, Ashley <apavel@omm.com>; Ji, Josh <jji@omm.com>
Cc: Berezin, Robert <robert.berezin@weil.com>; DiBlasi, Kelly <Kelly.DiBlasi@weil.com>; Morgan, Gabriel <gabriel.morgan@weil.com>; Silbert, Gregory <gregory.silbert@weil.com>; Collins, Reed <Reed.Collins@weil.com>; Hawkins, Howard (Howard.Hawkins@cwt.com) <Howard.Hawkins@cwt.com>; Ellenberg, Mark <Mark.Ellenberg@cwt.com>; 'Natbony, Bill' <Bill.Natbony@cwt.com>; 'casey.servais@cwt.com' <casey.servais@cwt.com>; Miller, Atara <AMiller@milbank.com>; Hughes, John <JHughes2@milbank.com>; Sosland, Martin - EXT <martin.sosland@butlersnow.com>; Jason Callen (Jason.Callen@butlersnow.com) <Jason.Callen@butlersnow.com>; Mintz, Douglas S. (dmintz@orrick.com) <dmintz@orrick.com>; Nayuan Trinidad (nzt@mcvpr.com) <nzt@mcvpr.com>
Subject: RE: Follow-up re: Discovery on Lift-Stay Motions

[EXTERNAL MESSAGE]

Counsel: We are in receipt of your correspondence of late last night further to our meet-and-confer of February 5, 2020 and associated correspondence. Although the Movants and the Government Parties obviously have significant differences of opinion concerning the factual issues that are relevant to the issues to be heard at the preliminary hearing, we appreciate your stated willingness to search for information responsive to the requests we circulated in advance of the meet-and-confer. We are willing to discuss the results of that search as soon as you are able. Given where we are, however, we do not believe that the current schedule for reply briefs or the preliminary hearing is realistic. Based on our last meet and confer, and the parties' recent correspondence, we expect that at least certain issues will likely have to be presented to Judge Dein for consideration. We do not think it would be efficient to do so on a piecemeal basis or if discovery is forthcoming.

Accordingly, we plan to file an urgent motion tomorrow seeking adjournment of the March 5 preliminary hearing to the April 22 omnibus hearing. In connection with that motion, we would propose that the Movants' reply briefs be due on April 6. In our view, this will afford the parties the necessary time to define the scope of discovery, cogently present any disputes to Judge Dein, and allow for consideration and incorporation of the information provided in connection with the reply briefs.

Please let us know the Oversight Board's and AAFAF's position on this request by **4pm tomorrow** (February 11). We are happy to get on a call to discuss further if you think it would be helpful.

Regards,
Grant

Grant R. Mainland | [Milbank](#) | Partner
55 Hudson Yards | New York, NY 10001
T: 212.530.5251 | M: 917.971.6310
gmainland@milbank.com | milbank.com

From: McKeen, Elizabeth L. <emckeен@omm.com>
Sent: Sunday, February 9, 2020 11:33 PM
To: Rappoport, Gaspard <Gaspard.Rappoport@weil.com>; Friedman, Peter <pfriedman@omm.com>; Uhland, Suzanne <suhland@omm.com>; Hammack, Scott <shammack@omm.com>; Firestein, Michael A. <MFirestein@proskauer.com>; Rappaport, Lary Alan <L.Rappaport@proskauer.com>; tmungovan@proskauer.com; Mervis, Michael T. <MMervis@proskauer.com>; Dale, Margaret A. (mdale@proskauer.com) <mdale@proskauer.com>; Pavel, Ashley <apavel@omm.com>; Ji, Josh <ji@omm.com>
Cc: Berezin, Robert <robert.berezin@weil.com>; DiBlasi, Kelly <Kelly.DiBlasi@weil.com>; Morgan, Gabriel <gabriel.morgan@weil.com>; Silbert, Gregory <gregory.silbert@weil.com>; Collins, Reed <Reed.Collins@weil.com>; Hawkins, Howard (Howard.Hawkins@cwt.com) <Howard.Hawkins@cwt.com>; Ellenberg, Mark <Mark.Ellenberg@cwt.com>; 'Natbony, Bill' <Bill.Natbony@cwt.com>; 'casey.servais@cwt.com' <casey.servais@cwt.com>; Miller, Atara <AMiller@milbank.com>; Mainland, Grant <GMainland@milbank.com>; Hughes, John <JHughes2@milbank.com>; Sosland, Martin - EXT <martin.sosland@butlersnow.com>; Jason Callen (Jason.Callen@butlersnow.com) <Jason.Callen@butlersnow.com>; Mintz, Douglas S. <dmintz@orrick.com> <dmintz@orrick.com>; Nayuan Trinidad (nzt@mcvpr.com) <nzt@mcvpr.com>
Subject: [EXT] RE: Follow-up re: Discovery on Lift-Stay Motions

Gaspard --

Please see the attached correspondence from myself and Margaret Dale on behalf of AAFAF and the FOMB, respectively.

Thanks,
Liz

O'Melveny

Elizabeth L. McKeen
emckeен@omm.com
O: +1-949-823-7150

O'Melveny & Myers LLP
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
[Website](#) | [LinkedIn](#) | [Twitter](#) | [Bio](#)

This message and any attached documents contain information from the law firm of O'Melveny & Myers LLP that may be confidential and/or privileged. If you are not the intended recipient, you may not read, copy, distribute, or use this information. If you have received this transmission in error, please notify the sender immediately by reply e-mail and then delete this message.